

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

NICOLE TAYLOR REED,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO.
)	
BIG LOTS STORES, INC.,)	2:06-CV-00380-MHT
)	
Defendant.)	
)	
)	

AFFIDAVIT OF GREGORY L. SMITH, JR.
IN SUPPORT OF DEFENDANT'S BILL OF COSTS

I, Gregory L. Smith, Jr., being duly sworn, state as follows:

1.

I am Of Counsel in the Atlanta, Georgia office of Jackson Lewis LLP. I have served as counsel for Defendant Big Lots Stores, Inc. ("Defendant") in the above-styled action. I have personal knowledge of the matters stated herein and am competent to testify as to the matters stated in this Affidavit.

2.

I have determined the photocopying expenses Defendant incurred during the course of this case in the following manner: I counted the number of pages of documents Defendant necessarily served on Nicole Taylor Reed ("Plaintiff"). I calculated a total of 319 pages Defendant necessarily served on Plaintiff. I calculated the total number of pages by multiplying the initial number of pages by the number of copies Defendant had to make. I next multiplied the total number of pages, 319, times twenty cents (\$0.20), and have calculated a total

cost of \$63.80 (319 x \$0.20). Documentation of these expenses is attached at Exhibit A to the Brief in Support of Defendant's Bill of Costs

3.

In addition, Defendant incurred a cost of \$147.43 in expenses paying for third parties to copy subpoenaed discovery documents and for the necessary services of a process server. Documentation of these expenses is attached as Exhibit B.

4.

I have assisted in the preparation of Defendant's Bill of Costs and Brief in Support of Defendant's Bill of Costs. I have reviewed the invoices attached as Exhibit C to the Brief in Support of Defendant's Bill of Costs and can attest they are true and correct copies of necessary payments Defendant made during the course of this action for deposition expenses.

5.

To calculate the deposition expenses in this case, I added the costs Defendant incurred for the court reporter's appearance and/or in obtaining written transcripts of Plaintiff's deposition transcript. I have that determined that Defendant incurred costs totaling \$1,160.35 for necessary deposition expenses in this case. Documentation of these expenses is attached at Exhibit C.

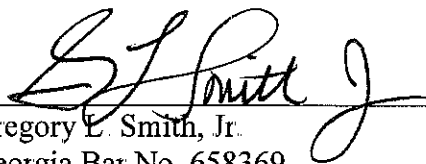
6.

By adding the copying costs and deposition expenses in this action, I have determined Defendant necessarily incurred taxable total costs totaling \$1,371.58 in the defense of this matter.

I declare pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the foregoing is true and correct and based upon my personal knowledge obtained by me in the performance of my duties.

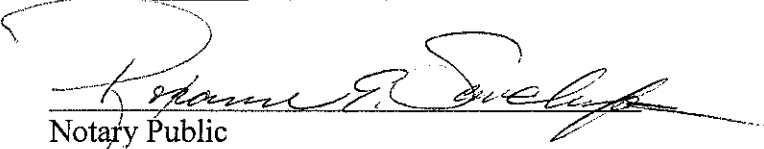
FURTHER AFFIANT SAYETH NOT.

This 5th day of July, 2007.



Gregory L. Smith, Jr.
Georgia Bar No. 658369

Sworn to and subscribed before
me this 5th day of July, 2007.



Notary Public

ROXANNE E. SANDERFER
NOTARY PUBLIC
Gwinnett County
State of Georgia
My Comm. Expires July 22, 2008